

# SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000  
FACSIMILE: 1-212-558-3588  
[WWW.SULLCROM.COM](http://WWW.SULLCROM.COM)

125 Broad Street  
New York, New York 10004-2498  
LOS ANGELES • PALO ALTO • WASHINGTON, D.C.  
FRANKFURT • LONDON • PARIS  
BEIJING • HONG KONG • TOKYO  
MELBOURNE • SYDNEY

May 23, 2017

Via ECF

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: In re SSA Bonds Antitrust Litigation, No. 16-cv-3711 (S.D.N.Y.)

Dear Judge Ramos:

I write on behalf of all parties in the above-referenced action to respectfully submit the attached stipulation<sup>1</sup> which proposes a briefing schedule for Defendants' anticipated motion(s) to dismiss Plaintiffs' Consolidated Class Action Complaint (the "Complaint") (ECF No. 130). In light of this stipulation and proposed briefing schedule, the parties request that the status conference scheduled for Thursday, May 25, 2017 be adjourned.

On March 10, 2017, the Court so ordered a stipulation establishing that (i) Plaintiffs must file a consolidated amended complaint no later than April 7, 2017; (ii) Defendants will file any motion(s) to dismiss by June 12, 2017; (iii) Plaintiffs will file any opposition by July 25, 2017; and (iv) Defendants will file any replies by September 8, 2017.

On April 7, 2017, Plaintiffs filed the Complaint, which named several new parties as Defendants, including BNP Paribas S.A., HSBC Holdings plc, HSBC Bank USA, N.A., HSBC Securities (USA) Inc., HSBC Bank plc, Royal Bank of Canada, RBC Europe Limited, Toronto-Dominion Bank Group, TD Bank, N.A., TD Securities Limited, and Gary McDonald (collectively the "New Defendants").

In light of this development, the parties conferred regarding a revised briefing schedule that would provide the New Defendants adequate time to coordinate their response to the Complaint with the other Defendants. The parties then entered into

---

<sup>1</sup> The stipulation was submitted to the Clerk concurrently with the filing of this letter. A copy of the stipulation is attached hereto as Exhibit 1.

Hon. Edgardo Ramos

-2-

the attached stipulation that has been respectfully submitted for Your Honor's consideration, which proposes the following revised motion to dismiss briefing schedule:

- a. Defendants will file any motion(s) to dismiss by July 14, 2017;
- b. Plaintiffs must file any opposition to motion(s) to dismiss by August 29, 2017; and
- c. Defendants will file their reply (or replies) to Plaintiffs' opposition by September 26, 2017.

Given their joint proposal on how to proceed in this action, the parties have no matters that they wish to submit to the Court at the status conference. Unless Your Honor would nonetheless like the parties to appear before the Court at this time, the parties believe it would be appropriate to adjourn the conference. The conference was previously adjourned at Plaintiffs' request from March 22, 2017 to April 11, 2017 in order to permit Plaintiffs additional time in which to file their consolidated complaint. It was then adjourned again until April 19, 2017 to permit the parties sufficient time to review the new pleading. The conference was adjourned at Defendants' request until May 25, 2017 to permit the New Defendants sufficient time to retain counsel.

Under the circumstances, the parties respectfully submit that the requested adjournment is appropriate.

Respectfully submitted,

/s/ Matthew J. Porpora

*Counsel for Royal Bank of Canada  
and RBC Europe Limited*

cc: All Counsel of Record (by ECF)